

June 29, 2017

1001 WATER STREET SUITE A-100 KERRVILLE, TX 78028 TEL 830.896.5200 FAX 830.896.5202 www.gvnw.com

#### **REDACTED - FOR PUBLIC INSPECTION**

VIA ECFS

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re:

Confidential Financial Information Subject to Protective Order Before the Federal Communications Commission., and requesting Confidential treatment for financial information pursuant to §§ 0.457 and 0.459 of the Commission's rules. Form 481 – Carrier Annual Reporting Data Collection, 2017.

WC 14-58.

Dear Ms. Dortch:

On behalf of Baca Valley Telephone Company, Inc. ("Baca Valley"), GVNW Consulting, Inc. hereby submits the attached redacted and confidential versions of its "FCC Form 481 – Carrier Annual Reporting Data Collection" information pursuant to §§ 54.313 and 54.422 of the Commission's rules, as filed with the Universal Service Administrative Company. A copy is also being submitted to the New Mexico Public Regulation Commission.

Baca Valley requests confidential treatment under the Protective Order adopted in this proceeding for the § 54.313(f)(2) financial information included in this report on the grounds that it is competitively sensitive information that is secure from public access and this information should not be released publicly for inspection as it could be used to disadvantage or harm Baca Valley. In addition, Baca Valley is requesting confidential treatment pursuant to §§ 0.457 and 0.459 of the Commission's rules for the Five-Year Build-Out Plan Progress Report and Map that is required by § 54.313(a)(1) to be attached to this report.

In accordance with the Protective Order, one redacted copy marked "REDACTED – FOR PUBLIC INSPECTION" and one non-redacted confidential version marked "CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO A PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION are being filed with the Commission. The redacted copy will be filed *via* the Electronic Comment Filing System.

If you have any questions, please contact me at sgatto@gvnw.com or 830-895-7226.

Sincerely.

Stephen Gatto

	REDACTED FOR PURILC INSPECTION							
FCC For	rm 481 - Carrier Annual Reporting  Data Collection Form	TED TOTAL OBEIGNAL EQUICIT	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013					
<010>	Study Area Code	492259						
<015>	Study Area Name	BACA VALLEY TEL CO						
<020>	Program Year	2018						
<030>	Contact Name: Person USAC should contact with questions about this data	Paul Briesh						
<035>	Contact Telephone Number: Number of the person identified in data line <030>	5752782101 ext.						
<039>	Contact Email Address: Email of the person identified in data line <030>	bvtpb@bacavalley.com						
	Form Type	54.313 and 54.422						

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

	30,7203											
<010>	0> Study Area Code											
<015>	Study Area Name				BACA VALLEY	BACA VALLEY TEL CO						
<020>	0> Program Year			2018	2018							
<030>	<030> Contact Name - Person USAC should contact regarding this data					Paul Briesh						
<035>	<035> Contact Telephone Number - Number of person identified in data line <030>					30> <sup>5752782101</sup>	ext.					•
<039>	D39> Contact Email Address - Email Address of person identified in data line <030> bvtpb@bacavalley.com											
<210>	For the prior	calendar vea	ır were there	any renortah	ale voice serv	ice outages?	No					
12107	TOT THE PHOT	calcilaal yee	ii, were there	any reportat	one voice serv	ice outages:						
<220>	<a></a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NORS									Did This Outage		
	Reference	Outage Start	<b>Outage Start</b>	Outage End	Outage End	Number of		911 Facilities	Service Outage	Affect Multiple		
	Number	Date	Time	Date	Time	<b>Customers Affected</b>	<b>Total Number of</b>	Affected	<b>Description (Check</b>	Study Areas	Service Outage	Preventative
							Customers	(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures
										_		

	Service Outage Resolution	Preventative Procedures
Reference Outage Start Outage Start Outage End Outage E		
Number Date Time Date Time Customers Affected Total Number of Affected Description (Check Study Areas S		
Customers         (Yes / No)         all that apply)         (Yes / No)           Image: Customers of the customers o	Resolution	Procedures

,	iulfilled Service Request ection Form			FCC Form 481  OMB Control No. 3060-0986/OMB Control N	No. 3060-0819
				July 2013	
<010>	Study Area Code	492259			
<015>	Study Area Name	BACA VALLEY TEL CO			
<020>	Program Year	2018			
<030> Contact Name - Person USAC should contact regarding this data		Paul Briesh			
<035> Contact Telephone Number - Number of person identified in data line <030>		5752782101 ext.			
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com			
<300> U	nfulfilled service request (voice)	0			
<310> [	Detail on attempts (voice)				
	Name	e of Attached Document		_	
<320>	Unfulfilled service request (broadband)	0			
<330> Detail on attempts (broadband)					
	N	ame of Attached Document			

(400) Number of Complaints per 1,000 customers	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code 492259	
<015>	Study Area Name	LEY TEL CO
<020>	Program Year 2018	
<030>	Contact Name - Person USAC should contact rega	ding this data Paul Briesh
<035>	Contact Telephone Number - Number of person ic <030>	entified in data line 5752782101 ext.
<039>	Contact Email Address - Email Address of person i <030>	dentified in data line bvtpb@bacavalley.com
<400>	Select from the drop-down list to indicate how you voice complaints (zero or greater) for voice teleph calendar year for each service area in which you are any facilities you own, operate, lease, or otherwise	ony service in the prior Offered only fixed voice e designated an ETC for
<410>	Complaints per 1000 customers for fixed voice	0.0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you end-user customer complaints (zero or greater) for the prior calendar year for each service area in what an ETC for any facilities you own, operate, lease, or	r broadband service in Offered only fixed broadband ich you are designated
<440>	Complaints per 1000 customers for fixed broadba	nd 0.0
<450>	Complaints per 1000 customers for mobile broads	and

•	npliance With Service Quality Standards and Consumer Protection Rules ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013				
<010>	Study Area Code	492259					
<015>	Study Area Name	BACA VALLEY TEL CO					
<020>	Program Year	2018					
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh					
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.					
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com					
<500>	Certify compliance with applicable service quality standards and consumer pro	otection rules Yes					
		492259nm510.pdf					
<510>	<510> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance						
<515>	Certify compliance with applicable minimum service standards						

	unctionality in Emergency Situations Ollection Form		FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010>	Study Area Code	492259	
<015>	Study Area Name	BACA VALLEY TEL CO	
<020>	Program Year	2018	
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh	
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com	
<600>	Certify compliance regarding ability to function in emergency situations	Yes	
<610>	Descriptive document for Functionality in Emergency Situations	492259nm610.pdf	

(700) Price Offerings including Voice Rate Data		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	492259	
<015> Study Area Name	BACA VALLEY TEL CO	
<020> Program Year	2018	
<030> Contact Name - Person USAC should contact regarding this data	Paul Briesh	
<035> Contact Telephone Number - Number of person identified in data I	ine <030> 5752782101 ext.	
<039> Contact Email Address - Email Address of person identified in data	line <030> bvtpb@bacavalley.com	
<701> Residential Local Service Charge Effective Date <702> Single State-wide Residential Local Service Charge		

<703>	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
					Residential Local			Mandatory Extended Area	
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
					See at	tached worksheet			
					<del>000 a</del>	taonoa workonoot			

(710) Broadbrand Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code 4	92259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<b>10</b>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
11	<91>	<d2></d2>	<01>	<02>	<c></c>	<u1></u1>	<uz></uz>	<u3></u3>	<042
						Broadband Service -			Usage Allowance
				State Regulated		Download Speed	Broadband Service -	Usage Allowance	Action Taken When
	State	Exchange (ILEC)	Residential Rate	Fees	Total Rate and Fees	(Mbps)	Upload Speed (Mbps)	(GB)	Limit Reached (select)
				- See attacl	hed				
					lou				
				<del>worksheet -</del>					

(800) Operating Companies  Data Collection Form			FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010>	Study Area Code		492259
<015>	Study Area Name	·	BACA VALLEY TEL CO
<020>	Program Year		2018
<030>	Contact Name - Person L	JSAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Num	ber - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - I	Email Address of person identified in data line <030>	bvtpb@bacavalley.com
<810>	Reporting Carrier	Baca Valley Telephne Company, Inc.	
<811>	Holding Company	Not Applicable	
<812>	Operating Company	Baca Valley Telephone Company, Inc.	

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
-			
-			
-			
-	See atta	ached workshe	et
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(900) Tribal Lands Reporting Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013
<010> Study Area Code	492259
<015> Study Area Name	BACA VALLEY TEL CO 2018
<020> Program Year	Paul Briesh
<030> Contact Name - Person USAC should contact regarding this data	E7E2792101 ove
<035> Contact Telephone Number - Number of person identified in data line <039> Contact Email Address - Email Address of person identified in data line	50.>
· ·	No
<900> Does the filing entity offer tribal land services? (Y/N)	NO
<910> Tribal Land(s) on which ETC Serves	
<920> Tribal Government Engagement Obligation	Name of Attached Document
If your company serves Tribal lands, please select (Yes,No, NA) for each to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:	Select Yes or No or Not Applicable
<921> Needs assessment and deployment planning with a focus community anchor institutions. <922> Feasibility and sustainability planning;	n Tribal
<923> Marketing services in a culturally sensitive manner;	
<924> Compliance with Rights of way processes	
<925> Compliance with Land Use permitting requirements	
<926> Compliance with Facilities Siting rules	
<927> Compliance with Environmental Review processes	
<928> Compliance with Cultural Preservation review processes	
<929> Compliance with Tribal Business and Licensing requireme	b.

(1000) Voice and Broadband Service Rate Comparability  Data Collection Form			FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010>	Study Area Code		492259
<015>	Study Area Name		BACA VALLEY TEL CO
<020>	Program Year		2018
<030>	Contact Name - Person USAC should contact regarding this data		Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line	<030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line	<030>	bvtpb@bacavalley.com
<1000>	Voice services rate comparability certification	Yes 4922	s 259nm1010.pdf
<1010>	Attach detailed description for voice services rate comparability compliance		
			Name of Attached Document
<1020>	Broadband comparability certification		s - Pricing is no more than the most recent applicable benchmark announced by e Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	4922!	59nm1030.pdf
			Name of Attached Document

	o Terrestrial Backhaul Reporting lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	492259	
<015>	Study Area Name	BACA VALLEY TEL CO	
<020>	Program Year	2018	
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh	
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com	
<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	kbps	

Lifeline	erms and Condition for Lifeline Customers ection Form			FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		492259	
<015>	Study Area Name		BACA VALLEY TEL CO	
<020>	Program Year		2018	
<030>	Contact Name - Person USAC should contact regarding this data		Paul Briesh	
<035>	Contact Telephone Number - Number of person identified in data l	ine <030>		
<039>	Contact Email Address - Email Address of person identified in data	line <030	> bvtpb@bacavalley.com	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		492259nm1210.pdf	Name of Attached Document
<1220>	Link to Public Website	HTTP		
or the we	neck these boxes below to confirm that the attached document(s), on line is bsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:	•		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	V		
<1222>	Details on the number of minutes provided as part of the plan,	~		
<1223>	Additional charges for toll calls, and rates for each such plan.	V		

Data Col	rice Cap Carrier Additional Documentation lection Form Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	492259	
<015>	Study Area Name	BACA VALLEY TEL CO	
<020>	Program Year	2018	
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh	
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com	

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

#### **Incremental Connect America Phase I reporting**

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.		
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4		
<2023>	Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only. The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.		
<2024A>	Round 2 Recipient of Incremental Support?		
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	
<2025A>	Round 2 Recipient of Incremental Support?		
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		

(2005) Price Cap (	Carrier Additional Documentation	FCC Form 481	
Data Collection F	orm		3060-0986/OMB Control No. 3060-0819
Including Rate-of-	Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013	
Price Ca <sub>l</sub>	p Carrier Connect America ICC Support {47 CFR § 54.313(d)}		
<2016>	Certification support used to build broadband		
Connect	America Phase II Reporting {47 CFR § 54.313(e)}		
<2017A>	Connect America Fund Phase II recipient?		
<2017C>	Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.		
<2018>	Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)	Name of Attached Document Listing Required Information	
<2019>	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)		

(3005) Rate Of Return Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	492259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

	Progress Report on 5 Year Plan			
(3009)	Carrier certifies to 54.313(f)(1)(iii)			
(3010A)	Certification of Public Interest Obligations {47 CFR §	Υe	es - Attach Certifica	
(22122)	54.313(f)(1)(i)}	SAU akad Daw	t tt tt - Banataad	492259nm3010b.pdf
(3010B)	Please Provide Attachment	Name of Attached Docur Information	ment Listing Requirea	
(3012A)	Community Anchor Institutions {47 CFR §	No - No New Community	Anchors	
(3012B)	54.313(f)(1)(ii)} Please Provide Attachment	Name of Attached Docui	ment Listing Required	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR	Information (Yes/No)	$\odot$ $\bigcirc$	
(2013)	§ 54.313(f)(2)}	(163/140)	0 0	
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	• 0	
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires: Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		·	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows			492259nm3017.pdf
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Docur Information	ment Listing Required	
(3018) (3019) (3020)	If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers Document(s) for Balance Sheet, Income Statement	(Yes/No)	0 0	
	and Statement of Cash Flows			
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers			
(3023)	Underlying information subjected to a review by an independent certified public accountant			
(3024)	Underlying information subjected to an officer certification.			
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows			
(3026)	Attach the worksheet listing required information	Name of Attached Docur Information	ment Listing Required	

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	492259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com

Financial Data Summary  (3027) Revenue  (3028) Operating Expenses  (3029) Net Income  (3030) Telephone Plant In Service(TPIS)  (3031) Total Assets  (3032) Total Debt  (3033) Total Equity  (3034) Dividends	
(3028) Operating Expenses (3029) Net Income (3030) Telephone Plant In Service(TPIS) (3031) Total Assets (3032) Total Debt (3033) Total Equity	Financial Data Summary
(3029) Net Income (3030) Telephone Plant In Service(TPIS) (3031) Total Assets (3032) Total Debt (3033) Total Equity	(3027) Revenue
(3030) Telephone Plant In Service(TPIS) (3031) Total Assets (3032) Total Debt (3033) Total Equity	(3028) Operating Expenses
(3031) Total Assets (3032) Total Debt (3033) Total Equity	(3029) Net Income
(3032) Total Debt (3033) Total Equity	(3030) Telephone Plant In Service(TPIS)
(3033) Total Equity	(3031) Total Assets
	(3032) Total Debt
(3034) Dividends	(3033) Total Equity
	(3034) Dividends

1005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
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<010>	Study Area Code	492259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data li	ne <030> 5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data l	ine <030> bvtpb@bacavalley.com

## 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

### Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001**. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

#### Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a**. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

#### If yes to 4003A, please provide a response for 4003B.

speed and data usage allowances available in the

relevant geographic area.

ii yes to 4003A, piease provide a response for 4003	D.
<b>4003b</b> . Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information
Broadband Deployment Locations – FCC 14-98 (par	agraph 80)
<b>4004a</b> . Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information
<b>4004b</b> . Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband	Name of Attached Document Listing Required Information

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	492259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

# Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: Signature of Authorized Officer: Date Printed name of Authorized Officer: Title or position of Authorized Officer: Telephone number of Authorized Officer: Study Area Code of Reporting Carrier: Filing Due Date for this form: Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Page 19

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	492259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an A	gent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) GVNW Consulting, Inc. is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.		
Name of Authorized Agent: GVNW Consulting, Inc.		
Name of Reporting Carrier: BACA VALLEY TEL CO		
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/26/2017	
Printed name of Authorized Officer: Paul Briesh		
Title or position of Authorized Officer: VP/General Manager		
Telephone number of Authorized Officer: 5752782101 ext.215		
Study Area Code of Reporting Carrier: 492259	Filing Due Date for this form: 07/03/2017	
, 9	by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment e 18 of the United States Code, 18 U.S.C. § 1001.	

#### TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier							
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients o the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported							
Name of Reporting Carrier: BACA VALLEY TEL CO							
Name of Authorized Agent Firm: GVNW Consulting, Inc.							
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date:	06/26/2017					
Name of Authorized Agent Employee: Stephen Gatto							
Title or position of Authorized Agent or Employee of Agent Consultant							
Telephone number of Authorized Agent or Employee of Agent: 8308957226 ext.							
Study Area Code of Reporting Carrier: 492259 Filing Due Date for this form: 07/03/2017							
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.1 18 of the United States Code, 18 U.S.C. § 1001.	C. §§ 502, 503(b), or	fine or imprisonment under Title					

Attachments

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	492259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
		()		Residential Local			Mandatory Extended Area	
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
NM	All		FR	16.0	2.0	0.91	0.0	18.91

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	492259
<015>	Study Area Name	BACA VALLEY TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Paul Briesh
<035>	Contact Telephone Number - Number of person identified in data line <030>	5752782101 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bvtpb@bacavalley.com

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2></d2>	· <d3></d3>		<d4></d4>
			Residential	State Regulated	Total Rates	Broadband Service -	Broadband Service	Usage Allowance	Usage Allowance
	State	Exchange (ILEC)	Rate	Fees	and Fees	Download Speed	-Upload Speed (Mbps)	(GB)	Action Taken
						(Mbps)	Mbps)		When Limit Reached (select)
	NM	All	39.95	0.0	39.95	6.0	1.0	999999	Other, None
							I		

(800) Op	perating Companies			FCC Form 481
Data Collection Form				OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		492259	
<015>	Study Area Name		BACA VALLEY TEL CO	
<020>	Program Year		2018	
<030>	Contact Name - Person	USAC should contact regarding this data	Paul Briesh	
<035>	Contact Telephone Num	nber - Number of person identified in data line <030>	5752782101 ext.	
<039>	Contact Email Address -	Email Address of person identified in data line <030>	bvtpb@bacavalley.com	
<810>	Reporting Carrier	Baca Valley Telephne Company, Inc.		
<811>	<b>Holding Company</b>	Not Applicable		

Baca Valley Telephone Company, Inc.

<812> Operating Company

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
-	Sierra Communications, Inc.		
-			
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Attachment File: 492259nm510.pdf

#### BACA VALLEY TELEPHONE COMPANY, INC. – SAC 492259

FCC Form - Program Year 2018

#### **Line 510**

# COMPLIANCE WITH SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES - § 54.313(a)(5)

Baca Valley Telephone Company, Inc. ("Baca Valley" or "the Company") complies with all applicable service quality standards and consumer protection rules as required by the New Mexico Public Regulation Commission ("PRC") and the Federal Communications Commission ("FCC").

The rates, terms and conditions under which the Company operates are identified in its Local Company Tariff, which is approved by the PRC. The Company's tariff contains provisions regarding its customer service and protection practices, including resolving customer disputes, applying for, refusing, disconnection, and cancellation of service. Rates and terms of service are disclosed to customers upon application for service as part of a packet of information for new customers.

Service quality standards are established by the PRC and Baca Valley consistently meets or exceeds those requirements. The Company provides an annual report to the New Mexico PRC pursuant to the commission's rules.

The protection of its customers' privacy and information is a constant part of Baca Valley's quality of service. The Company has a policy and operating procedures that comply with the FCC's Customer Proprietary Network Information ("CPNI") rules (47 C.F.R §§ 64.2001 – 64.2011). Certification of Baca Valley's compliance with the FCC's CPNI rules is filed with the FCC annually.

Attachment File: 492259nm610.pdf

## BACA VALLEY TELEPHONE COMPANY, INC. – SAC 492259

FCC Form 481 – Program Year 2018

#### **Line 610**

#### ABILITY TO FUNCTION IN EMERGENCY SITUATIONS - § 54.313(a)(6)

Baca Valley Telephone Company, Inc. ("Baca Valley" or "the Company") is capable of functioning in emergency situations. Baca Valley has a reasonable amount of back-up power to ensure functionality without a commercial external power source. The Company has permanently installed standby power generators at its exchange switching offices and remote switching locations have a minimum of eight (8) hours of backup battery capacity. These remote sites are also equipped to accept portable emergency power if necessary. The Company's network is capable of managing traffic spikes resulting from emergency conditions.

Attachment File: 492259nm1010.pdf

#### BACA VALLEY TELEPHONE COMPANY, INC. – SAC 492259

FCC Form 481 - Program Year 2018

#### **Line 1010**

#### DESCRIPTION OF VOICE SERVICES RATE COMPARABILITY - § 54.313(a)(10)

Baca Valley Telephone Company, Inc.'s ("Baca" or "the Company") Voice Services Pricing is no more than two standard deviations above the applicable urban rate floor for voice services. On February 14, 2017, the Wireline Competition Bureau ("Bureau") established a new average urban floor rate of \$22.49 and a maximum of \$49.51 as the Rate Comparability Benchmark. The FCC's previously announced phase-in of the floor rate was frozen at \$18.00 by the FCC (May 17, 2017). As shown by Baca's response to Line 700 (Attachment File: 492259nm700.pdf), Baca's total residential voice service rate plus mandatory state fees is \$18.91. When all state and federal mandatory charges are added to Baca's residential voice service rate the total rate is below the \$49.51 Rate Comparability Benchmark set by the Bureau.

Attachment File: 492259nm1030.pdf

#### BACA VALLEY TELEPHONE COMPANY, INC. – SAC 492259

#### FCC Form 481 – Program Year 2018

#### **Line 1030**

#### <u>DESCRIPTION OF</u> BROADBAND SERVICES RATE COMPARABILITY - § 54.313(a)(12)

Baca Valley Telephone Company, Inc's., ("Baca") Broadband Services Pricing meets the FCC's broadband pubic interest obligations because it is no more than the applicable benchmark for broadband services announced by the Bureau on February 14, 2017 (DA 17-167).

In furtherance with its broadband public interest obligation pursuant to 54.308(a), Baca offers broadband service, upon reasonable request, at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, at rates that are reasonably comparable to rates for comparable offerings in urban areas.

If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, Baca offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream at pricing that meets the bureau's broadband reasonable comparability service rates.

As shown by Baca's response to Line 710 on its Form 481 filing, Baca offers broadband service of 6 Mbps downstream/1 Mbps upstream with no usage allowances for \$39.95. Since the Bureau's Excel Spreadsheet tool for 2017, which can be used by carriers to determine the broadband benchmarks for specific service characteristics, indicates that broadband service of 6 Mbps downstream/1 Mbps upstream with no usage allowances should be offered at no more than \$71.22, Baca's 6 Mbps downstream/1 Mbps upstream broadband service offering at \$39.95 meets the Bureau's requirement for broadband reasonable comparability service rates.

Attachment File: 492259nm1210.pdf

#### BACA VALLEY TELEPHONE COMPANY, INC. – SAC 492259

#### FCC Form - Program Year 2018

#### **Line 1210**

# TERMS AND CONDITION OF VOICE TELEPHONY LIFELINE PLANS - § 54.422(a)(2)

Baca Valley Telephone Company, Inc. ("Baca Valley" or "the Company") provides Lifeline Assistance to its low-income subscribers who apply and are eligible pursuant to federal rules to receive income-based benefits.

Lifeline subscribers may receive unlimited local calling monthly at a discounted rate for service of \$9.25 per month.

Eligible Lifeline subscribers may obtain Toll Blocking free of charge. The company's voice Lifeline plan does not include any free minutes of use for toll.

## **Baca Valley Telephone Company, Inc**

P.R.C. No. 2

1<sup>st</sup> Revised Sheet No. 4-8

Cancels Original Sheet No. 4-8

#### LOCAL EXCHANGE SERVICE

- 4. Local Exchange Service (Cont'd)
  - 4.5 <u>Low Income Telephone Assistance Program</u>
    - 4.5.1 Definition

The New Mexico Low-Income Telephone Assistance Program provides for a credit against the recurring monthly rate for the provision of local residential service for certain low-income customers.

- 4.5.2 Application
  - 4.5.2.1 The New Mexico Low-Income Telephone Assistance Program credit is only available to low-income customers who meet eligibility requirements established by the Medicaid program and to those customers that qualify for the Low Income Home Energy Assistance Program under the eligibility criteria for grantees recognized by the United States Department of Health and Human Services.
  - 4.5.2.2 At the option of the Company, the Company will verify eligibility requirements directly with the state agency charged with the duty of administering the Medicaid program or the Low Income Home Energy Assistance Program, or require the customer to obtain a certificate verifying such eligibility.
  - 4.5.2.3 The Company may not disconnect the service of a Low-Income Telephone Assistance Program customer for the non-payment of toll charges unless the Company has received a waiver from the Commission allowing disconnection of service for this reason.
  - 4.5.2.4 Upon subscribing to the Low-Income Telephone Assistance Program, a customer will be offered a subscription, at no charge, to toll blocking service, which denies the customer access to the long distance telecommunications network. However, the customer does not have to subscribe to toll blocking service.
  - 4.5.2.5 The Company may not collect a service deposit in order to initiate Low-Income Telephone Assistance Program service, if the qualifying low-income consumer voluntarily elects toll blocking from the Company.

Issue Date: 12/18/14

# Baca Valley Telephone Company, Inc

P.R.C. No. 2

2<sup>nd</sup> Revised Sheet No. 4-9

Effective Date: 01/1/15

Cancels 1st Revised Sheet No. 4-9

#### LOCAL EXCHANGE SERVICE

- 4. <u>Local Exchange Service</u> (Cont'd)
  - 4.5 <u>Low Income Telephone Assistance Program</u> (Cont'd)
    - 4.5.2 Application (Cont'd)
      - 4.5.2.6 The monthly discount to eligible subscribers is set forth in 4.5.5, following. The discount will be applied to the following local exchange service offerings:

Residential Access Line Service.

4.5.3 Reserved for Future Use

(T)

Issue Date: 12/18/14

# Baca Valley Telephone Company, Inc

P.R.C. No. 2

3<sup>rd</sup> Revised Sheet No. 4-10

Cancels 2<sup>nd</sup> Revised Sheet No. 4-10

#### LOCAL EXCHANGE SERVICE

- 4. Local Exchange Service (Cont'd)
  - 4.5 <u>Low Income Telephone Assistance Program</u> (Cont'd)
    - 4.5.4 Regulations
      - 4.5.4.1 The New Mexico Low-Income Telephone Assistance Program credit will begin with the date the Company identifies applicants who qualify for Medicaid benefits or the Low Income Home Energy Assistance Program, or when new service is established for a qualifying customer subject to 4.5.2.6 above. The credit will be prorated on the basis of a 30-day month from the effective date of the customer's application.
      - 4.5.4.2 Reserved for Future Use

(T)

4.5.4.3 The credit is applicable only to the customer's principal residence line.

4.5.5 Monthly Rates

All Exchanges	Rate Reduction
Federal Lifeline (LITAP) Credit	\$ 9.25
State LITAP Credit	\$

Issue Date: 12/18/14

Effective Date: 01/1/15

Monthly



June 14, 2017

Marlene H. Dortch, Secretary Federal Communications Commission 9300 East Hampton Drive Capitol Heights, MD 20743

re:

WC Docket No. 14-58, Annual Report, Form 481 for High-Cost Recipient 54.313(f)(1) "Milestone Certification"

Dear Ms. Dortch:

In compliance with the Commission's rules pursuant to § 54.313(f)(1) relating to the filing of Form 481, Baca Valley Telephone Company, Inc., SAC – 492259, wishes to certify to the Commission that the Company:

Has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, at rates that are reasonably comparable to rates for comparable offerings in urban areas, and that reasonable requests for such service are met within a reasonable amount of time.

If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, our company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream at pricing that meets the Wireline Competition Bureau's broadband reasonable comparability service rates benchmark.

If you have any questions, I may be contacted at 575-278-2101.

Sincerely,

Paul Briesh

General Manager

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions,

searching existing data sources, gathering and maintaining the	ne data needed, and cor	npleting and reviewing	the collection of information.				
USDA-RUS	}		This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.				
			BORROWER NAME				
OPERATING REP	ORT FOR		Baca Valley Telephone Company, Inc.				
TELECOMMUNICATIONS BORROWERS		S					
INSTRUCTIONS-Submit report to RUS within 30 day.					/ER DESIGNATIO	DN	
For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.			December, 2016	NM052			
We hereby certify that the entries in this i	report are in accor		ERTIFICATION counts and other records of the system and reflect the sta	itus of the	system		
to the best of our knowledge and belief.							
ALL INSURANCE REQUIRED BY 7 RENEWALS HAVE BEEN OBTAINE			I, RUS, WAS IN FORCE DURING THE REPORTIN	NG PERI	OD AND		
		THIS REPORT	PURSUANT TO PART 1788 OF 7CFR CHAPTER 2	XVII			
X All of the obligations under the RUS loan doc have been fulfilled in all material respects.	uments		There has been a default in the fulfillment of the oblig under the RUS loan documents. Said default(s) is/ar specifically described in the Telecom Operating Repo	re			
Marjorie Briesh		3/31/2017					
	•	DATE	=				
		PART	A. BALANCE SHEET				
	BALANCE	BALANCE			BALANCE	BALANCE	
ASSETS	PRIOR YEAR	END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY		PRIOR YEAR	END OF PERIOD	
CURRENT ASSETS			CURRENT LIABILITIES				
Cash and Equivalents			25. Accounts Payable				
Cash-RUS Construction Fund			26. Notes Payable				
3. Affiliates:			27. Advance Billings and Payments				
a. Telecom, Accounts Receivable			28. Customer Deposits				
b. Other Accounts Receivable			29. Current Mat. L/T Debt				
c. Notes Receivable			30. Current Mat. L/T Debt-Rur. Dev.				
4. Non-Affiliates:			31. Current MatCapital Leases				
a. Telecom, Accounts Receivable			32. Income Taxes Accrued				
b. Other Accounts Receivable			33. Other Taxes Accrued				
c. Notes Receivable			34. Other Current Liabilities				
5. Interest and Dividends Receivable			35. Total Current Liabilities (25 thru 34)				
6. Material-Regulated			LONG-TERM DEBT				
7. Material-Nonregulated			36. Funded Debt-RUS Notes				
8. Prepayments			37. Funded Debt-RTB Notes				
9. Other Current Assets			38. Funded Debt-FFB Notes				
10. Total Current Assets (1 Thru 9)			39. Funded Debt-Other				
NONCURRENT ASSETS			40. Funded Debt-Rural Develop. Loan				
11. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt				
a. Rural Development			42. Reacquired Debt				
b. Nonrural Development			43. Obligations Under Capital Lease				
12. Other Investments			44. Adv. From Affiliated Companies				
a. Rural Development			45. Other Long-Term Debt				
b. Nonrural Development			46. Total Long-Term Debt (36 thru 45)				
13. Nonregulated Investments			OTHER LIAB. & DEF. CREDITS				
14. Other Noncurrent Assets			47. Other Long-Term Liabilities				
15. Deferred Charges			48. Other Deferred Credits     49. Other Jurisdictional Differences				
16. Jurisdictional Differences							
17. Total Noncurrent Assets (11 thru 16) PLANT, PROPERTY, AND EQUIPMENT			50. Total Other Liabilities and Deferred Credits (47 thru 49)  EQUITY				
18. Telecom, Plant-in-Service			51. Cap. Stock Outstand. & Subscribed				
19. Property Held for Future Use			51. Cap. Stock Outstand. & Subscribed  52. Additional Paid-in-Capital				
20. Plant Under Construction			53. Treasury Stock				
21. Plant Adj., Nonop. Plant & Goodwill			54. Membership and Cap. Certificates				
22. Less Accumulated Depreciation			55. Other Capital				
23. Net Plant (18 thru 21 less 22)			56. Patronage Capital Credits				
24. TOTAL ASSETS (10+17+23)			57. Retained Earnings or Margins				
, ,			58. Total Equity (51 thru 57)				
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)				

Total Equity =

% of Total Assets

USDA-RUS

# OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

NM0520

PERIOD ENDING

INSTRUCTIONS- See RUS Bulletin 1744-2

December, 2016

	PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS						
	ITEM	PRIOR YEAR	THIS YEAR				
1.	Local Network Services Revenues						
2.	Network Access Services Revenues						
3.	Long Distance Network Services Revenues						
4.	Carrier Billing and Collection Revenues						
5.	Miscellaneous Revenues						
6.	Uncollectible Revenues						
7.	Net Operating Revenues (1 thru 5 less 6)						
8.	Plant Specific Operations Expense						
9.	Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)						
10.	Depreciation Expense						
11.	Amortization Expense						
12.	Customer Operations Expense						
13.	Corporate Operations Expense						
14.	Total Operating Expenses (8 thru 13)						
15.	Operating Income or Margins (7 less 14)						
16.	Other Operating Income and Expenses						
17.	State and Local Taxes						
18.	Federal Income Taxes						
19.	Other Taxes						
20.	Total Operating Taxes (17+18+19)						
21.	Net Operating Income or Margins (15+16-20)						
22.	Interest on Funded Debt						
23.	Interest Expense - Capital Leases						
24.	Other Interest Expense						
_	Allowance for Funds Used During Construction						
	Total Fixed Charges (22+23+24-25)						
27.	Nonoperating Net Income						
28.	Extraordinary Items						
29.	Jurisdictional Differences						
30.	Nonregulated Net Income						
31.	Total Net Income or Margins (21+27+28+29+30-26)						
32.	Total Taxes Based on Income						
33.	Retained Earnings or Margins Beginning-of-Year						
34.	Miscellaneous Credits Year-to-Date						
35.	Dividends Declared (Common)						
36.	Dividends Declared (Preferred)						
37.	Other Debits Year-to-Date						
38.	Transfers to Patronage Capital						
39.	Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]						
40.	Patronage Capital Beginning-of-Year						
41.	Transfers to Patronage Capital						
42.	Patronage Capital Credits Retired						
43.	Patronage Capital End-of-Year (40+41-42)						
44.	Annual Debt Service Payments						
45.	Cash Ratio [(14+20-10-11) / 7]						
46.	Operating Accrual Ratio [(14+20+26) / 7]						
47.	TIER [(31+26) / 26]						
48.	DSCR [(31+26+10+11) / 44]						

USDA-RUS

# OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

NM0520

PERIOD ENDED

December, 2016

INSTRUCTIONS - See RUS Bulletin 1744-2

	Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION							
	1. R/	ATES	2. SUBS	CRIBERS (ACCESS LIN	ES)	3. ROUT	E MILES	
EXCHANGE	B-1	R-1	BUSINESS	RESIDENTIAL	TOTAL	TOTAL (including fiber)	FIBER	
I	(a)	(b)	(a)	(b)	(c)	` (a) ´	(b)	

Des Moines
Maxwell
MobileWireless
Route Mileage
Outside Exchange
Area
Total
No. Exchanges

USDA-RUS

# OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

BORROWER DESIGNATION

NM0520

PERIOD ENDED

December, 2016

INSTRUCTIONS - See RUS Bulletin 1744-2

Maxwell Total

Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION
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	Part C. SUBSCRIBER (ACCESS LINE), ROUTE MILE, & HIGH SPEED DATA INFORMATION							
	4. BROADBAND SERVICE							
				Details on Least Expensive Broadband Service				
EXCHANGE	No. Access Lines with BB available (a)	No Of Broadband Subscribers (b)	Number Of Subscribers (c)	Advertised Download Rate (Kbps)	Advertised Upload Rate (Kbps)	Price Per Month	Standalone/Pckg	Type Of Technology (g)
Des Moines	(4)	(2)	(0)	(4)	(0)	(1)	(.)	(9)

	USDA-RUS BORROWER DESIGNATION						
	OODA NOO			NM0520	Olonytholy		
OPERATING REPORT FOR							
	TELECOMMUNICATIONS BOR		PERIOD ENDING December, 2				
MOTEURI DE LO DE L	W. C. 47440			December, 2	.016		
INSTRUCTIONS- See RUS Bu	STRUCTIONS- See RUS Bulletin 1744-2						
	PART D. SYSTEM DATA						
1. No. Plant Employees	2. No. Other Employees	3. Square Miles Served		4. Access Lines per Squa	re Mile	5. Subscribers per Route Mile	
		PART E. TOLL	DATA				
Study Area ID Code(s)	2. Types of Tol	Settlements (Check or	ie)				
	a. <u>492259</u>		Interstate:	Average Schedul	е	X Cost Basis	
	b c		Intrastate:	Average Schedul	е	X Cost Basis	
	d						
	e						
	f						
	g						
	h						
	<u>'</u>						
	1.						
	PART F.	FUNDS INVESTED IN	PLANT DURING YE	AR			
1. RUS, RTB, & FFB Loan Fur	nds Expended						
2. Other Long-Term Loan Fund	Other Long-Term Loan Funds Expended						
<ol><li>Funds Expended Under RU</li></ol>	Funds Expended Under RUS Interim Approval						
4. Other Short-Term Loan Fun	nds Expended						
<ol><li>General Funds Expended (0)</li></ol>	Other than Interim)						
Salvaged Materials							
Contribution in Aid to Const							
Gross Additions to Telecom	ı. Plant (1 thru 7)						
	PART G. INVESTMENTS IN AFFILIATED COMPANIES						
		CURRENT	YEAR DATA		CUMULATIVE D	ATA	
				Cumulative	Cumulative		
	INVESTMENTS	Investment	Income/Loss	Investment	Income/Loss	Current	
		This Year	This Year	To Date	To Date	Balance	
	(a)	(b)	(c)	(d)	(e)	(f)	
	npanies - Rural Development						
<ol><li>Investment in Affiliated Com</li></ol>	npanies - Nonrural Development						

LISDA-RUS

BORROWER D	ESIGNATION		
NM0520			
PERIOD ENDIN	IG		
December,	2016		

TELECOMMUNICATIONS BORROWERS  PERIOD ENDING December, 2016  PART H. CURRENT DEPRECIATION RATES  Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)  EQUIPMENT CATEGORY  1. Land and support assets - Motor Vehicles 2. Land and support assets - Aircraft 3. Land and support assets - Special purpose vehicles 4. Land and support assets - Garage and other work equipment 5. Land and support assets - Buildings 6. Land and support assets - Furniture and Office equipment 7. Land and support assets - General purpose computers 8. Central Office Switching - Digital 9. Central Office Switching - Operator Systems	OPERATING REPORT FOR	NM0520		
PART H. CURRENT DEPRECIATION RATES  Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)    EQUIPMENT CATEGORY				
PART H. CURRENT DEPRECIATION RATES  Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)    EQUIPMENT CATEGORY   DEPRECIATION RATE	I LLLOOMINORIOA HORO BOIMONLING			
Are corporation's depreciation rates approved by the regulatory authority with jurisdiction over the provision of telephone services? (Check one)    EQUIPMENT CATEGORY   DEPRECIATION RATE		December, 2016		
EQUIPMENT CATEGORY  1. Land and support assets - Motor Vehicles 2. Land and support assets - Aircraft 3. Land and support assets - Special purpose vehicles 4. Land and support assets - Special purpose vehicles 5. Land and support assets - Special purpose vehicles 6. Land and support assets - Buildings 6. Land and support assets - Furniture and Office equipment 7. Land and support assets - Furniture and Office equipment 8. Central Office Switching - Digital 9. Central Office Switching - Operator Systems 11. Central Office Switching - Operator Systems 12. Central Office Transmission - Radio Systems 13. Information origination/termination - Station apparatus 14. Information origination/termination - Customer premises wiring 15. Information origination/termination - Large private branch exchanges 16. Information origination/termination - United by the Information origination/termination - Other terminal equipment 17. Information origination/termination - Other terminal equipment 18. Cable and wire facilities - Aerial cable - Metal 20. Cable and wire facilities - Underground cable - Fiber 21. Cable and wire facilities - Buried cable - Fiber 22. Cable and wire facilities - Buried cable - Fiber 23. Cable and wire facilities - Buried cable - Fiber 24. Cable and wire facilities - Buried cable - Fiber 25. Cable and wire facilities - Conduit systems	PART H. CURREN	IT DEPRECIATION RATES		
1. Land and support assets - Motor Vehicles 2. Land and support assets - Special purpose vehicles 3. Land and support assets - Special purpose vehicles 4. Land and support assets - Garage and other work equipment 5. Land and support assets - Buildings 6. Land and support assets - Furniture and Office equipment 7. Land and support assets - General purpose computers 8. Central Office Switching - Digital 9. Central Office Switching - Analog & Electro-mechanical 10. Central Office Switching - Operator Systems 11. Central Office Transmission - Radio Systems 12. Central Office Transmission - Station apparatus 13. Information origination/termination - Station apparatus 14. Information origination/termination - Large private branch exchanges 15. Information origination/termination - Public telephone terminal equipment 16. Information origination/termination - Other terminal equipment 17. Information origination/termination - Other terminal equipment 18. Cable and wire facilities - Poles 19. Cable and wire facilities - Aerial cable - Metal 20. Cable and wire facilities - Underground cable - Metal 21. Cable and wire facilities - Underground cable - Fiber 22. Cable and wire facilities - Buried cable - Fiber 23. Cable and wire facilities - Buried cable - Fiber 24. Cable and wire facilities - Buried cable - Fiber 25. Cable and wire facilities - Conduit systems			X	YES NO
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3. Land and support assets - Special purpose vehicles 4. Land and support assets - Garage and other work equipment 5. Land and support assets - Buildings 6. Land and support assets - Furniture and Office equipment 7. Land and support assets - General purpose computers 8. Central Office Switching - Digital 9. Central Office Switching - Analog & Electro-mechanical 10. Central Office Switching - Operator Systems 11. Central Office Transmission - Radio Systems 12. Central Office Transmission - Circuit equipment 13. Information origination/termination - Station apparatus 14. Information origination/termination - Customer premises wiring 15. Information origination/termination - Public telephone terminal equipment 17. Information origination/termination - Other terminal equipment 18. Cable and wire facilities - Aerial cable - Metal 20. Cable and wire facilities - Aerial cable - Fiber 21. Cable and wire facilities - Underground cable - Fiber 22. Cable and wire facilities - Buried cable - Fiber 23. Cable and wire facilities - Buried cable - Fiber 24. Cable and wire facilities - Buried cable - Fiber 25. Cable and wire facilities - Conduit systems				
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<ol> <li>Land and support assets - General purpose computers</li> <li>Central Office Switching - Digital</li> <li>Central Office Switching - Analog &amp; Electro-mechanical</li> <li>Central Office Switching - Operator Systems</li> <li>Central Office Transmission - Radio Systems</li> <li>Central Office Transmission - Circuit equipment</li> <li>Information origination/termination - Station apparatus</li> <li>Information origination/termination - Customer premises wiring</li> <li>Information origination/termination - Large private branch exchanges</li> <li>Information origination/termination - Public telephone terminal equipment</li> <li>Information origination/termination - Other terminal equipment</li> <li>Cable and wire facilities - Poles</li> <li>Cable and wire facilities - Aerial cable - Metal</li> <li>Cable and wire facilities - Underground cable - Metal</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> </ol>	5. Land and support assets - Buildings			
<ol> <li>Central Office Switching - Digital</li> <li>Central Office Switching - Analog &amp; Electro-mechanical</li> <li>Central Office Switching - Operator Systems</li> <li>Central Office Transmission - Radio Systems</li> <li>Central Office Transmission - Circuit equipment</li> <li>Information origination/termination - Station apparatus</li> <li>Information origination/termination - Customer premises wiring</li> <li>Information origination/termination - Large private branch exchanges</li> <li>Information origination/termination - Public telephone terminal equipment</li> <li>Information origination/termination - Other terminal equipment</li> <li>Cable and wire facilities - Poles</li> <li>Cable and wire facilities - Aerial cable - Metal</li> <li>Cable and wire facilities - Underground cable - Fiber</li> <li>Cable and wire facilities - Underground cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Conduit systems</li> </ol>	Land and support assets - Furniture and Office equipment			
<ol> <li>Central Office Switching - Analog &amp; Electro-mechanical</li> <li>Central Office Switching - Operator Systems</li> <li>Central Office Transmission - Radio Systems</li> <li>Central Office Transmission - Circuit equipment</li> <li>Information origination/termination - Station apparatus</li> <li>Information origination/termination - Customer premises wiring</li> <li>Information origination/termination - Large private branch exchanges</li> <li>Information origination/termination - Public telephone terminal equipment</li> <li>Information origination/termination - Other terminal equipment</li> <li>Cable and wire facilities - Poles</li> <li>Cable and wire facilities - Aerial cable - Metal</li> <li>Cable and wire facilities - Underground cable - Fiber</li> <li>Cable and wire facilities - Underground cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Conduit systems</li> </ol>	Land and support assets - General purpose computers			
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<ol> <li>Central Office Transmission - Radio Systems</li> <li>Central Office Transmission - Circuit equipment</li> <li>Information origination/termination - Station apparatus</li> <li>Information origination/termination - Customer premises wiring</li> <li>Information origination/termination - Large private branch exchanges</li> <li>Information origination/termination - Public telephone terminal equipment</li> <li>Information origination/termination - Other terminal equipment</li> <li>Cable and wire facilities - Poles</li> <li>Cable and wire facilities - Aerial cable - Metal</li> <li>Cable and wire facilities - Aerial cable - Fiber</li> <li>Cable and wire facilities - Underground cable - Metal</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Conduit systems</li> </ol>				
12. Central Office Transmission - Circuit equipment  13. Information origination/termination - Station apparatus  14. Information origination/termination - Customer premises wiring  15. Information origination/termination - Large private branch exchanges  16. Information origination/termination - Public telephone terminal equipment  17. Information origination/termination - Other terminal equipment  18. Cable and wire facilities - Poles  19. Cable and wire facilities - Aerial cable - Metal  20. Cable and wire facilities - Aerial cable - Fiber  21. Cable and wire facilities - Underground cable - Metal  22. Cable and wire facilities - Underground cable - Fiber  23. Cable and wire facilities - Buried cable - Metal  24. Cable and wire facilities - Buried cable - Fiber  25. Cable and wire facilities - Conduit systems	Central Office Switching - Operator Systems			
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<ul> <li>14. Information origination/termination - Customer premises wiring</li> <li>15. Information origination/termination - Large private branch exchanges</li> <li>16. Information origination/termination - Public telephone terminal equipment</li> <li>17. Information origination/termination - Other terminal equipment</li> <li>18. Cable and wire facilities - Poles</li> <li>19. Cable and wire facilities - Aerial cable - Metal</li> <li>20. Cable and wire facilities - Aerial cable - Fiber</li> <li>21. Cable and wire facilities - Underground cable - Metal</li> <li>22. Cable and wire facilities - Underground cable - Fiber</li> <li>23. Cable and wire facilities - Buried cable - Metal</li> <li>24. Cable and wire facilities - Buried cable - Fiber</li> <li>25. Cable and wire facilities - Conduit systems</li> </ul>	12. Central Office Transmission - Circuit equipment			
<ol> <li>Information origination/termination - Large private branch exchanges</li> <li>Information origination/termination - Public telephone terminal equipment</li> <li>Information origination/termination - Other terminal equipment</li> <li>Cable and wire facilities - Poles</li> <li>Cable and wire facilities - Aerial cable - Metal</li> <li>Cable and wire facilities - Aerial cable - Fiber</li> <li>Cable and wire facilities - Underground cable - Metal</li> <li>Cable and wire facilities - Underground cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Conduit systems</li> </ol>	13. Information origination/termination - Station apparatus			
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<ol> <li>Information origination/termination - Other terminal equipment</li> <li>Cable and wire facilities - Poles</li> <li>Cable and wire facilities - Aerial cable - Metal</li> <li>Cable and wire facilities - Aerial cable - Fiber</li> <li>Cable and wire facilities - Underground cable - Metal</li> <li>Cable and wire facilities - Underground cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Metal</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Buried cable - Fiber</li> <li>Cable and wire facilities - Conduit systems</li> </ol>	15. Information origination/termination - Large private branch exchang			
18. Cable and wire facilities - Poles  19. Cable and wire facilities - Aerial cable - Metal  20. Cable and wire facilities - Aerial cable - Fiber  21. Cable and wire facilities - Underground cable - Metal  22. Cable and wire facilities - Underground cable - Fiber  23. Cable and wire facilities - Buried cable - Metal  24. Cable and wire facilities - Buried cable - Fiber  25. Cable and wire facilities - Conduit systems	6. Information origination/termination - Public telephone terminal equipment			
19. Cable and wire facilities - Aerial cable - Metal 20. Cable and wire facilities - Aerial cable - Fiber 21. Cable and wire facilities - Underground cable - Metal 22. Cable and wire facilities - Underground cable - Fiber 23. Cable and wire facilities - Buried cable - Metal 24. Cable and wire facilities - Buried cable - Fiber 25. Cable and wire facilities - Conduit systems	7. Information origination/termination - Other terminal equipment			
20. Cable and wire facilities - Aerial cable - Fiber  21. Cable and wire facilities - Underground cable - Metal  22. Cable and wire facilities - Underground cable - Fiber  23. Cable and wire facilities - Buried cable - Metal  24. Cable and wire facilities - Buried cable - Fiber  25. Cable and wire facilities - Conduit systems	Cable and wire facilities - Poles			
<ul> <li>21. Cable and wire facilities - Underground cable - Metal</li> <li>22. Cable and wire facilities - Underground cable - Fiber</li> <li>23. Cable and wire facilities - Buried cable - Metal</li> <li>24. Cable and wire facilities - Buried cable - Fiber</li> <li>25. Cable and wire facilities - Conduit systems</li> </ul>	. Cable and wire facilities - Aerial cable - Metal			
<ul> <li>22. Cable and wire facilities - Underground cable - Fiber</li> <li>23. Cable and wire facilities - Buried cable - Metal</li> <li>24. Cable and wire facilities - Buried cable - Fiber</li> <li>25. Cable and wire facilities - Conduit systems</li> </ul>	. Cable and wire facilities - Aerial cable - Fiber			
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25. Cable and wire facilities - Conduit systems	23. Cable and wire facilities - Buried cable - Metal			
·	24. Cable and wire facilities - Buried cable - Fiber			
26. Cable and wire facilities - Other	25. Cable and wire facilities - Conduit systems			
	26. Cable and wire facilities - Other			

BORROWER DESIGNATION USDA-RUS NM0520 OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS PERIOD ENDED December, 2016

INSTRUCTIONS – See help in the online application.

INST	RUCTIONS – See help in the online application.	
	PART I – STATEMENT OF CASH FLOWS	
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	
	CASH FLOWS FROM OPERATING ACTIVITIES	
2.	Net Income	
	Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities	
3.	Add: Depreciation	
4.	Add: Amortization	
5.	Other (Explain) change in interest receivable	
	Changes in Operating Assets and Liabilities	•
6.	Decrease/(Increase) in Accounts Receivable	
7.	Decrease/(Increase) in Materials and Inventory	
8.	Decrease/(Increase) in Prepayments and Deferred Charges	
9.	Decrease/(Increase) in Other Current Assets	
10.	Increase/(Decrease) in Accounts Payable	
11.	Increase/(Decrease) in Advance Billings & Payments	
12.	Increase/(Decrease) in Other Current Liabilities	
13.	Net Cash Provided/(Used) by Operations	
	CASH FLOWS FROM FINANCING ACTIVITIES	
14.	Decrease/(Increase) in Notes Receivable	
15.	Increase/(Decrease) in Notes Payable	
16.	Increase/(Decrease) in Customer Deposits	
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	
20.	Less: Payment of Dividends	
21.	Less: Patronage Capital Credits Retired	
22.	Other (Explain)	
		-
23.	Net Cash Provided/(Used) by Financing Activities	-
	CASH FLOWS FROM INVESTING ACTIVITIES	-
24.	Net Capital Expenditures (Property, Plant & Equipment)	-
25.	Other Long-Term Investments	-
26.	Other Noncurrent Assets & Jurisdictional Differences	-
27.	Other (Explain)	
28.	Not Cash Provided/(Llsed) by Investing Activities	-
29.	Net Cash Provided/(Used) by Investing Activities	-
30.	Net Increase/(Decrease) in Cash Ending Cash	
30.	Enumy Cash	Davisian Data 2040
		Revision Date 2010

USDA-RUS	BORROWER DESIGNATION
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	NM0520
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
NOTES TO THE OPERATING REPORT FO	DR TELECOMMUNICATIONS BORROWERS
NOTES TO THE OFENTING REPORT FO	A TELECOMMONICATIONS BORROWERS
Independent Acc	countants' Report
Supplementary Information	

USDA-RUS	BORROWER DESIGNATION
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	NM0520
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
NOTES TO THE OPERATING REPOR	T FOR TELECOMMUNICATIONS BORROWERS
Other Metters	
Other Matters	

USDA-RUS	BORROWER DESIGNATION
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS	NM0520
INSTRUCTIONS - See RUS Bulletin 1744-2	PERIOD ENDED December, 2016
CERTIFICATION LOAN DEFAULT NOTES TO THE OPERA'	TING REPORT FOR TELECOMMUNICATIONS BORROWERS